

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA**

In re: CHANGE HEALTHCARE, INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION

This Document Relates to:
ALL ACTIONS

MDL No. 24-3108 (DWF/DJF)

**PROVIDER PLAINTIFFS' MOTION
FOR DECLARATORY JUDGMENT**

Total Care Dental and Orthodontics, et al.,

Plaintiffs,

v.

UnitedHealth Group Incorporated,
UnitedHealthCare Services, Inc., Optum
Insight, Change Healthcare Inc., Change
Healthcare Operations, LLC, Change
Healthcare Solutions, LLC, Change
Healthcare Holdings, Inc., Change
Healthcare Technologies, LLC, and
Change Healthcare Pharmacy Solutions,
Inc., Optum, Inc., Optum Financial, Inc.,
Optum Bank, and Optum Pay,

Defendants.

Case No. 0:25-cv-00179-DWF-DJF

Provider Plaintiffs hereby move the Court for Order declaring that under the Temporary Funding Assistant Program (TFAP) contract language repayment is due 45 days after claims processing services have resumed *and* all payments impacted during the Service Shutdown are fully processed (i.e., all payments are in the process of being paid). Plaintiffs also request that the Court pause Defendants' efforts to collect repayment on the TFAP loans or otherwise penalize Provider Plaintiffs for failing to repay the loans until the issue of interpretation is resolved on its merits.

Said motion is based on the pleadings, files, records, and proceedings herein, as well as the memorandum of law and declaration filed in support of this motion.

Dated: April 2, 2025

s/Daniel E. Gustafson

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